

UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND

JOHN DOE,

Plaintiff,

v.

C.A. NO.: 15-cv-00144-S-LDA

BROWN UNIVERSITY, in  
Providence in the State of Rhode Island  
and Providence Plantations,  
Defendant.

**JOINT MOTION FOR THE COURT'S ENTRY OF CONSENT DECREE AND  
FINAL JUDGMENT REGARDING COUNT III OF PLAINTIFF'S COMPLAINT**

Plaintiff John Doe and Defendant Brown University jointly move that the Court approve and enter the Consent Decree and Final Judgment Regarding Count III of Plaintiff's Complaint in the form attached as Exhibit A. As reasons therefore, the parties state the following:

1. On August 30, 2018, the parties participated in a settlement conference with the Honorable John J. McConnell, Jr. During the settlement conference, the parties reached an agreement to resolve all claims pled in Plaintiff's Complaint.

2. As part of their agreement, the parties drafted the attached Consent Decree and Final Judgment adjudicating Plaintiff's breach of contract claims pled in Count III of the Complaint.

3. Under the parties' confidential settlement agreement which has been fully executed, all other counts in Plaintiff's Complaint will be dismissed with prejudice through a Dismissal Stipulation to be filed in this litigation.

Therefore, in furtherance of the resolution of this litigation and consistent with their agreement, the parties request that the Court approve and enter the attached Consent Decree and Final Judgment Regarding Count III of Plaintiff's Complaint.

For Plaintiff John Doe

By His Attorneys,

NESENOFF & MILTENBERG, LLP

/s/ Andrew T. Miltenberg

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November 1, 2018

-and-

Local Counsel for plaintiff John Doe,

/s/ Samuel D. Zurier

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November 1, 2018

For Defendant

BROWN UNIVERSITY

By Its Attorney,

/s/ Steven M. Richard

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November 1, 2018